



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Andrew Hurley  
Department of History  
University of Missouri-St. Louis  
1 University Blvd.  
St. Louis, MO 63121

Re: Freedom of Information Act Request EPA-R9-2014-003422

Dear Mr. Hurley:

This letter responds to the above-referenced Freedom of Information Act request you submitted for the following information:

“documents that might shed light on land-uses and material flows at these sites up to the discovery of contamination. This would include any information about the chain of ownership and especially the chain of commercial/industrial activities at the site. For each type of activity, I am interested in the source of incoming materials (e.g. raw materials used in industrial processes, geographic origin and type of waste deposited in landfill) as well as the destination of finished products (i.e. purchasers of manufactured or reprocessed commodities.)”

The CERCLA sites included in your FOIA request are:

Amco Chemical, Alameda, CA, EPA ID# CA0001576081  
Pemaco, Maywood, CA, EPA ID#: CAD980737092  
Liquid Gold Oil, Corp., Richmond, CA, EPA ID# CAT000646208  
United Heckathorn Co., Richmond, CA, EPA ID# CAD981436363  
Cooper Drum Co, South Gate, CA, EPA ID# CAD055753370  
Verdese Carter Park, Oakland, CA

EPA is making available releasable site-related documents identified by you via EPA's FOIA Online website, with the exception of the Cooper Drum Superfund Site for which EPA provided you access to an FTP site containing a large number of releasable site-related documents, access which you agreed is an adequate response.

As you know, EPA provided you a complete document index of all available records for each of the other sites. You reviewed these indices, marked documents of interest to you, and returned the indices to EPA. EPA then reviewed the records you requested to ensure they are not exempt from disclosure under FOIA, and has uploaded to FOIA Online all documents that are not exempt from disclosure. The provided documents are listed in the attached Excel file with the filename EPA-R9-2014-003422 Released.xls. The document numbers listed in Column A

correspond to the filename of the associated document provided through FOIA Online. Please note that several documents have been redacted because certain information contained within those documents is exempt from mandatory disclosure by virtue of 5 U.S.C. 552(b), Exemptions 5 and 6 (see Column C of the attached Excel file for the specific exemption applicable to a document).

We are unable to provide you with the documents, or portions of documents, which EPA has determined to be exempt from mandatory disclosure by virtue of 5 U.S.C. 552(b). An itemized list of the withheld material along with the basis for withholding is provided in the attached Excel file with the filename EPA-R9-2014-003422 Withheld.xls. The specific exemption codes are listed in Column F, and correspond to the following exemptions:

FX5: Inter/Intragency Memo [Insert at least those sub-categories reflected in index of withheld documents]

FX6: Personal Privacy

FX7: Enforcement Confidential

CBI: Confidential Business Information Claimed

DAW: Attorney Work Product

As we discussed via email, a number of documents related to the United Heckathorn site are still being reviewed to determine whether or not they are exempt from disclosure. Those documents are listed as "UNC" (unclassified) in Column F of the withheld files list. EPA will make a determination on these documents and respond to you in writing by August 15, 2014.

You may appeal this partial denial to the National Freedom of Information Officer, U.S. EPA, FOIA and Privacy Branch, 1200 Pennsylvania Avenue, N.W. (2822T), Washington, DC 20460 (U.S. Postal Service Only), FAX: (202) 566-2147, E-mail: [hq.foia@epa.gov](mailto:hq.foia@epa.gov). Only items mailed through the United States Postal Service may be delivered to 1200 Pennsylvania Avenue, NW. If you are submitting your appeal via hand delivery, courier service or overnight delivery, you must address your correspondence to 1301 Constitution Avenue, N.W., Room 6416J, Washington, DC 20004. Your appeal must be made in writing, and it must be submitted no later than 30 calendar days from the date of this letter. The Agency will not consider appeals received after the 30 calendar day limit. The appeal may include as much or as little related information as you wish, as long as it clearly identifies the determination being appealed and includes the assigned FOIA request number - EPA-R9-2014-003422). For quickest possible handling, the appeal letter and its envelope should be marked "Freedom of Information Act Appeal."

Please contact Sharon Murray at 415-947-4250 should you have any questions concerning this matter.

Sincerely,



Enrique Manzanilla  
Superfund Division Director

Enclosures

**bcc:** Regional FOI Office